

EXHIBIT C



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Kate Dominguez
Gibson Dunn
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Re: *Headwater Research, LLC v. Verizon Communications Inc., et al.*, No. 23-cv-00352 (E.D. Tex.)

Dear Ms. Dominguez:

I write concerning Verizon's document production from December 21, 2023, which is deficient because Verizon has failed to produce "[s]ource code, specifications, schematics, flow charts, artwork, formulas, or other documentation sufficient to show the operation of any aspects or elements of an Accused Instrumentality identified by the patent claimant in its P. R. 3-1(c)." P.R. 3-2. Specifically, Verizon has failed to produce documents or things sufficient to show the operation of any aspects or elements of Verizon's "[s]ervers, hardware, software, and services leased, owned, supported, and/or operated by Verizon comprising Verizon's wireless network services functionality" which are accused of infringing Headwater's Asserted Patents. Indeed, the only technical documents produced by Verizon relate to mobile phone operations, such as Verizon requirements documents.

As explained in my November 14, 2023, letter, Headwater's infringement charts attached to Headwater's infringement contentions establish that the accused instrumentalities comprise "telecommunications service plans... provided through various network elements such as telecommunications base stations and cell sites, edge servers, and other telecommunications servers." *See* Headwater's Sept. 28, 2023, Infringement Contentions, Exs. B and C. Further, Headwater indicated that "Verizon provides various network service plans to customers for purchase, including through the Verizon.com website as well as through Verizon-provided services such as its pre-paid mobile service category." *Id.* Headwater's infringement charts placed Verizon on notice, months ago, of the products Headwater accuses of infringement in this case. *See, e.g., Team Worldwide Corp. v. Acad., LTD*, No. 2:19-CV-00092-JRG-RSP, 2020 WL 4601635, at *4 (E.D. Tex. Aug. 11, 2020); *see also, e.g., Whipstock Servs., Inc. v. Schlumberger Oilfield Servs.*, No. 6:09-CV-113, 2010 WL 143720, at *2 (E.D. Tex. Jan. 8, 2010).



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Please confirm that Verizon will produce documents or things sufficient to show the operation of any aspects or elements of Verizon's servers, hardware, software, and services leased, owned, supported, and/or operated by Verizon comprising Verizon's wireless network services functionality, including telecommunications service plans provided through various network elements such as telecommunications base stations and cell sites, edge servers, and other telecommunications servers offered by Verizon **by January 11, 2024**, or provide your availability to meet and confer before then.

Regards,

/s/ Jason M. Wietholter

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